



**California
Building
Industry
Association**

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September 3, 2003

Bryan Alcorn
Energy Efficiency Division
California Energy Commission
1516 9th Street, MS-35
Sacramento, CA 95814-5512

Re: Proposed 2005 Building Energy Efficiency Standards

CBIA has participated in and in general supports the adoption of the proposed 45-day language for the 2005 Building Energy Efficiency Standards. The following is a list of outstanding concerns of the building industry.

- 1) That 2005 Title 24 software that reflects the current proposal becomes available for analysis.
- 2) The CEC initiate credits for complying with the proposed Lighting Mandatory Measures and the High Quality Insulation Installation by December 31, 2003.
- 3) In review of the recently revised Residential Duct Insulation study it is the building industry concern that the costs used for R-6 ducts is low. CBIA estimates the upgrade cost from R-4.2 to R-6 to be \$168. That would make R-6 ducts not cost-effective in Climate Zones 1 and 3-9.
- 4) In typical construction the building industry does not believe wrapping the hot water line to the kitchen is cost effective. CBIA is reviewing the Life Cycle Analysis and the draw assumptions for this proposed Mandatory Feature.
- 5) There is a lack of information on the very recent suggestion that 13 watt light fixtures be required to have electronic ballasts. CBIA would like information on costs and availability.
- 6) CBIA would like to understand the proposed compressor sizing credit (Residential ACM Manual, Section 4.7.2). CBIA strongly opposes any sizing restriction on air conditioners.

CBIA looks forward to resolving these issues with CEC staff and the smooth adoption of the 2005 Building Energy Efficiency Standards

Sincerely,

Michael G. Hodgson
Chair, CBIA Energy Subcommittee

cc: Commissioner Robert Pernell
Commissioner Art Rosenfeld
Robert Raymer, CBIA Technical Director
Valerie Hall
Bill Pennington